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12 **UNITED STATES DISTRICT COURT**
13 **DISTRICT OF NEVADA**
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15 JOHN LIGE, an individual,

Case No: 2:16-cv-00603-JAD-(PAL)

16 Plaintiff,

17 vs.

18
19 CLARK COUNTY, a political subdivision of
the State of Nevada; DOES I-V; and ROES
20 VI-X,

21 Defendants.

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28 **STIPULATION AND ORDER**
TO
EXTEND DEADLINE
TO
FILE JOINT PRETRIAL ORDER
[SECOND REQUEST]

Plaintiff John Lige, by and through his attorney of record, Dan M. Winder, Esq. of the Law Office of Dan M. Winder, P.C., and Defendant Clark County, by and through its attorney of record, Danielle C. Miller, Esq. of Lewis Brisbois Biggaard & Smith, hereby stipulate and agree:

1. The Joint-Pretrial Order in this matter is to be filed by up to and including Monday, Monday, May 7, 2018.

1 The reasons for this request are the following:

- 2 1. In the last week or so and in the next two weeks, Plaintiff's counsel has been and will
3 be working to meet the at least following inordinate amount of deadlines:
- 4 a. Motion for Reconsideration of Interlocutory Order (granting partial motion for
5 summary judgment) dated 3/26/18, *Evans v. UMC*, due asap, District of
6 Nevada, Case No. 2:16-cv-00603-JAD-(PAL);
7 b. Plaintiff's responses to Defendant's First Set of Interrogatories, Requests for
8 Admissions, and Second Set of Requests for Production, *Muwakkil v. CCSD*,
9 due 4/23/18, Eighth Judicial District Court, Case No. A-17-755222-C;
10 c. Retention of expert and coordination of expert report, initial disclosure
11 deadline 05/02/18, *Muwakkil v. CCSD*, Eighth Judicial District Court, Case
12 No. A-17-755222-C;
13 d. Coordination of rebuttal expert report, rebuttal disclosure deadline 4/30/18,
14 jury trial date 09/10/18, *Thorpe v. Mumpower, et. al.*, Eighth Judicial District
15 Court, Case No. A-15-714465-C;
16 e. Responses to Defendant Mumpower's Second Set of Requests for Production
17 to Plaintiff Thorpe and Plaintiff Burns, due 05/02/18, jury trial date 09/10/18,
18 *Thorpe v. Mumpower, et. al.*, Eighth Judicial District Court, Case No. A-15-
19 714465-C;
20 f. Preparation of Initial Disclosures, *Zuniga v. Miller*, due 4/23/18, Eighth
21 Judicial District Court, Case No. A-17-762692-C;
22 g. Reply to Defendant Clark County's Response to Plaintiff's Motion for
23 Reconsideration (ECF No. 127), *Lige v. Clark County*, due 04/25/18, District
24 of Nevada, Case No. 2:16-cv-00603-JAD-(PAL);
25 h. Coordinating performance of Compliance Order for Charter Bus company to
26 obtain operating authority, 05/07/18 deadline, Nevada Transportation
27 Authority Docket No. 17-03035.

- 1 2. Plaintiff has circulated a draft Joint Pretrial Order. Plaintiff and Defendant's counsel
2 seek the instant extension because they have not yet found a mutually available time
3 to personally confer. The parties have scheduled May 3, 2018 at 11 AM for the
4 personal conference and will work to have a jointly prepared draft finished prior to
5 the May 3, 2018 conference.
- 6 3. Counsel for Defendant has also been working and will be working on the following
7 matters, which have and will inhibit the ability to assist in the preparation of the Joint
8 Pretrial Order:
- 9 a. Arbitration Brief, *Hissung v. GEICO*, due 4/27/18, Eighth Judicial District
10 Court, Case No. A-17-758333-C;
- 11 b. Preparation of Initial Disclosures, *Mancao v. Clark County*, due 4/30/18;
12 District of Nevada Case No. 2:18-cv-00047-GMN-GWF;
- 13 c. Stipulated Protective Order, *Mancao v. Clark County*, due 4/30/18; District of
14 Nevada Case No. 2:18-cv-00047-GMN-GWF;
- 15 d. Reply in Support of Motion to Stay Proceedings, *Schneider v. Innette*
16 *Lewis;GEICO as Intervenor*, due 5/3/18, Eighth Judicial District Court, Case
17 No. A-16-734700-C;
- 18 e. Discovery Responses, *Pradera v. GEICO*, due 5/8/18, District of Nevada,
19 Case No. 2:18-cv-00156-MMD-NJK;
- 20 f. Reply in Support of Motion to Stay Proceedings, due 5/11/18, *Zervas v.*
21 *USAA*, District of Nevada, Case No. 2:18-cv-00051-JAD-GWF.
- 22 4. With the newly proposed May 7, 2018 Joint Pretrial Order deadline, this Honorable
23 Court would have approximately 316 days in which to set the case for trial within 3
24 years of the March 17, 2016 date of the filing of the complaint in the instant matter.
- 25 5. Due to the complex nature of this case and the time constraints discussed above, the
26 parties seek a two week extension in which to file their Joint Pretrial Order.

1 6. This stipulation is entered into in good faith and not to cause undue delay.
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DATED this 23rd day of April, 2018.

Law Office of Dan M. Winder, P.C.

/s/ Kristina Miletovic
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DATED this 23rd day of April, 2018.

Lewis Brisbois Bisgaard & Smith LLP

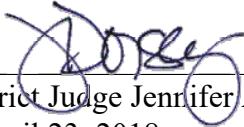
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11 **ORDER**
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13 **IT IS HEREBY ORDERED** the Joint-Pretrial Order in this matter is to be filed by up to
14 and including Monday, May 7, 2018. The parties are cautioned, however, that an attorney's
15 workload will not likely qualify as good cause for further extension of this deadline.

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18 U.S. District Judge Jennifer A. Dorsey
19 Dated: April 23, 2018
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